



U.S. Department of Justice

United States Attorney
Southern District of New York

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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

December 29, 2022

1/3/2023

BY ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The trial of this matter
will commence March 13, 2023
at 9:30 am. The proposed schedule
for pretrial submissions is
adopted by the Court.

Colleen McMahon

Re: United States v. Laforest, 21 Cr. 272 (CM)

Dear Judge McMahon:

The parties write in response to the Court's memorandum order dated November 29, 2022. The parties have conferred and respectfully request the Court adjourn the trial scheduled to commence on March 6, 2023 to March 13, 2023, as the Court proposed, assuming that brief adjournment still works for the Court. In addition, the parties jointly propose the following schedule for pretrial submissions:

<u>February 3, 2023:</u>	Motions in limine/Requests to Charge/Proposed Voir Dire
<u>February 17, 2023:</u>	Opposition to motions in limine
<u>February 24, 2023:</u>	Replies in support of motions in limine
<u>Week of March 6, 2023:</u>	Final pretrial conference

The Government has also agreed to produce Jencks Act/3500 Material no later than 3 weeks before trial commences.

The Government respectfully requests that the Court exclude time from March 6, 2023 through March 13, 2023. An exclusion is in the interest of justice because it will allow the parties to discuss potential dispositions for this case and to prepare for trial. The defendants consent to the exclusion.

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Matthew R. Shahabian
Matthew R. Shahabian
Assistant United States Attorney
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CC: Counsel of Record (by ECF)